

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

JON BURGE

Defendant,

v.

TONY ANDERSON

Intervenor.

No. 08 CR 846

Judge Joan Humphrey Lefkow

**MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER GOVERNING DISCOVERY**

The United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of an agreed protective order, and in support thereof states as follows:

1. On July 18, 2018, Tony Anderson moved to intervene in the above-captioned matter for the purpose of obtaining the release of pages 16 through 28 of Michael McDermott's September 25, 2008 grand jury testimony.
2. On July 25, 2018, over the government's objection, this Court granted the motion to intervene and ordered the government to produce pages 16 through 28 of Michael McDermott's September 25, 2008 grand jury testimony.

3. The grand jury testimony the government had been ordered to disclose includes sensitive information, typically protected by Federal Rule of Criminal Procedure 6(e). Consistent with the Court's prior orders (*see, e.g.*, R. 439), the government therefore seeks a protective order that limits the disclosure of the grand jury testimony.

4. The government has discussed the proposed protective order with counsel for the intervenor, who agrees to the entry of the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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